

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

Ramon Moreno, Donald O'Halloran, Omkharan Arasaratnam, Baiju Gajjar, and Rajath Nagaraja, individually and as representatives of a class of similarly situated persons, and on behalf of the Deutsche Bank Matched Savings Plan,

Plaintiffs,

v.

Deutsche Bank Americas Holding Corp., Deutsche Bank Matched Savings Plan Investment Committee, Deutsche Bank Americas Holding Corp. Executive Committee, Richard O'Connell, John Arvanitis, Robert Dibble, Tim Dowling, Richard Ferguson, James Gnall, Louis Jaffe, Patrick McKenna, David Pearson, Joseph Rice, Scott Simon, Andrew Threadgold, and James Volkwein,

Defendants.

Case No. 1:15-cv-09936 (LGS)

**PLAINTIFFS' NOTICE OF
MOTION AND MOTION
FOR FINAL APPROVAL OF
CLASS ACTION
SETTLEMENT**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on February 28, 2019 at 11:00 AM, before the Honorable Lorna G. Schofield, United States District Judge, in Courtroom 1106 of the Thurgood Marshall United States Courthouse, located at 40 Foley Square, New York, New York, 10007, Plaintiffs Ramon Moreno, Donald O'Halloran, Omkharan Arasaratnam, Baiju Gajjar, and Rajath Nagaraja ("Plaintiffs") will and hereby do move this Court for an Order granting final approval of the Parties' proposed Class Action Settlement Agreement. A proposed Final Approval Order is being submitted in connection with this motion and is also included as an exhibit to the Settlement Agreement.

This motion is made pursuant to Federal Rule of Civil Procedure 23(e), this Court's Preliminary Approval Order dated October 9, 2018 (ECF No. 335), and Article 4 of the Parties' Class Action Settlement Agreement (ECF No. 322-1) and is based on the accompanying Memorandum of Law and authorities cited herein, the declarations of Kai Richter and Michelle Kopperud and exhibits attached thereto, the Settlement Agreement, and all files, records, and proceedings in this matter.

Counsel for Plaintiffs have conferred with counsel for Defendants regarding this motion and have been advised that Defendants do not oppose the motion.

Dated: January 31, 2019

Respectfully Submitted,

NICHOLS KASTER, PLLP

/s/Kai H. Richter

Kai H. Richter, MN Bar No. 0296545*

Paul J. Lukas, MN Bar No. 22084X*

Jacob T. Schutz, MN Bar No. 0395648*

Carl F. Engstrom, MN Bar No. 0396298*

Michele R. Fisher, NY Bar Code # MF4600

*admitted *pro hac vice*

4600 IDS Center

80 S 8th Street
Minneapolis, MN 55402
Telephone: 612-256-3200
Facsimile: 612-338-4878

Attorneys for Plaintiffs and the Class

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2019, a true and correct copy of Plaintiffs' Notice of Motion and Motion for Final Approval of Class Action Settlement was served by CM/ECF to the parties registered to the Court's CM/ECF system.

Dated: January 31, 2019

/s/ Kai H. Richter
Kai H. Richter